



motorola

a Google company

20 August 2013

ACB TCB (via e-mail)

Subject: Motorola Mobility's Position Concerning Device 15.19 Marking Strategy.

Gentlemen;

Motorola Mobility LLC acknowledges that the subject device requires the notification described in 45 CFR 15.19(a)(3). While the subject device is larger than the general guidance provided by the FCC in KDB Publication 784748 (palm of the hand), we note that, both the referenced KDB Publication and the actual FCC rule (§15.19(a)(5)) allow for practicality considerations to apply in determining whether the aforementioned compliance statement must be printed on the device itself, or if it may appear in the User Guide.

We take the position that it is impracticable for us to put this compliance statement on the device itself for the following reasons:

- Excessive exterior markings would degrade the ID experience, where physical appearance is a key design objective, as it is in the case of this device.
- Portable devices such as this (like tablets) unlike a laptop, are generally held (rather than left lying on a table), such that all faces are visible.
- This approach is consistent with industry practice (based on benchmarking) for similar devices.

We further note that the compliance statement would be printed larger in the User Guide, and would also be available in the on-line version of the guide, thus improving readability and accessibility.

Thus we believe that this approach satisfies both the letter and intent of the FCC's rules and guidance. Please contact me at (954) 723-6272 if you require any additional information.

Regards,

A handwritten signature in blue ink that reads "John Lewczak".

FCC Liaison

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